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## MEMO ENDORSED

January 21, 2024

### VIA ECF

Hon. Edgardo Ramos, District Judge  
United States District Court for the Southern District of New York  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, NY 10007

Re: **Cercado, et al., v. Friedland Properties, Inc., et al.**  
Case No. 1:23-cv-08137-ER  
**Request to Stay Litigation**

The request is granted. The case is stayed pending mediation. The parties are directed to submit a status update by March 22, 2024. SO ORDERED.

Edgardo Ramos, U.S.D.J.  
Dated: January 22, 2024  
New York, New York

Dear Judge Ramos:

Pursuant to Your Honor's Individual Practices, Plaintiff Gregorio Cercado and Defendants Friedland Properties, Inc., Larstrand Corporation, Amaury Lopez, and Anthony Torres ("Defendants"), through undersigned counsel, respectfully request that the Court stay this matter, including Defendants' time to respond to the Complaint, pending completion of private mediation by the parties.

The parties have agreed to proceed to private mediation, and are working to select a mediator and schedule a mediation. The parties propose that they provide the Court a status update within sixty (60) days regarding the mediation, or sooner if requested by the Court.

This is the parties' first request for a stay of the litigation, including Defendants' time to respond to the Complaint. No party will be prejudiced by staying this matter, and it is in the interest of judicial economy as mediation may prevent further litigation of this matter. The only deadline affected by this request is Defendants' deadline to respond to Plaintiff's Complaint. The parties can work cooperatively to set a deadline in the event that mediation is unsuccessful.

Respectfully submitted,

/s/ Roman Avshalumov (with permission)  
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